

## Schena, Cristeen

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**From:** Butzler, Julia <Julia.Butzler@vermont.gov>  
**Sent:** Monday, September 28, 2015 11:24 AM  
**To:** Spejewski, Andrew  
**Subject:** CSOs / Middlebury / etc.

Hi Andrew,

Thanks for taking the time to speak with me about CSOs – like I mentioned, it is quite a hot topic up here in Vermont these days.

To summarize, my understanding is that you visited Middlebury (for an inspection), and stated that – despite our labeling it as such -- they did not have a CSO system. Also, Ernie Kelley stated that you were considering an enforcement order (please correct me if I got that wrong) to address the overflows.

Several questions have arisen from this information, primarily because we are in the process of updating our CSO Policy. I was hoping that you could clarify some things for me:

--If Middlebury started with a CSO, but has subsequently separated its sewers (but still overflows due to extreme precipitation events), is it no longer a CSO? Seeing that CSO abatement is an iterative process to reduce the stormwater in a system, with cumulative effects, it seems a little less clear than simply Combined versus Separate, no? (the EPA has a Fact Sheet regarding Inflow Reduction <http://www.epa.gov/npdes/pubs/inflwred.pdf> , e.g., roof drains, and CSOs)

--Are roof drains considered a 'stormwater connection', thereby designating the sewer system to be combined? It is pretty easy to say, No, in the case of a residential stormwater drain, but what about in the case of Springfield VT that had the roof drains of 3 industrial buildings (for an area of 9 acres) connected to the sewer line – that is a subcatchment in and of itself, its seems to me.

--ultimately, you suggested that Middlebury was NOT a CSO, and therefore should be removed from the list in the draft revision of our CSO Policy. However, from our point of view, these are stormwater-related overflows (albeit from I/I), and must be corrected.

Can you provide citations as to why they should be taking off the list? Addressing what exactly is a CSO, and how I/I is not covered by this definition?

Thanks so much and please feel free to call if that would be easier.

Julia Butzler



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